

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

NORVAL HOVERSON, an individual,

Plaintiff,

v.

KLICKITAT COUNTY, KLICKITAT COUNTY  
SHERIFF DEPARTMENT, and JOHN DOES 1-10,  
former and current employees and officials of  
KLICKITAT COUNTY,

Defendants.

NO.

NOTICE OF REMOVAL

TO: The United States District Court for the Western District of Washington at Seattle

Defendants hereby give notice that they are removing this case to the United States District Court for the Western District of Washington at Seattle on the grounds set forth below:

1. On or about October 21, 2016, plaintiff served a Summons and Complaint upon defendants. The Summons and Complaint was originally filed with the Superior Court for the State of Washington for Clark County on or about October 19, 2016, and denominated Cause No. 16-2-02073-2.

NOTICE OF REMOVAL - 1

**CHRISTIE LAW GROUP, PLLC**  
2100 WESTLAKE AVENUE N., SUITE 206  
SEATTLE, WA 98109  
206-957-9669

2. This Notice is being filed within 30 days of defendants' initial receipt of plaintiff's Complaint. All of the defendants in the above matter agree to the removal of this case to the United States District Court.

3. This is a civil action alleging deprivation of the plaintiff's constitutional rights in violation of 42 U.S.C. § 1983.

4. 28 U.S.C. § 1441(b) provides in part as follows:

Any civil action of which the district courts have original jurisdiction founded on a claim or a right arising under the Constitution, treaties or laws of the United States shall be removable without regard to the citizenship or residence of the parties.

5. Plaintiff's Complaint alleges violations of the United States Constitution under 42 U.S.C. § 1983. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1441. Removal is proper to the Western District of Washington because the district embraces Clark County, which is where this action was originally filed.

A true and correct copy of the Complaint served upon these defendants is attached hereto.

WHEREFORE, defendants give notice that the court action pending against them in Clark County Superior Court has been removed from that court to the United States District Court for the Western District of Washington.

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1 DATED this 16<sup>th</sup> day of November, 2016.

2 CHRISTIE LAW GROUP, PLLC

3 By /s/ Robert L. Christie  
4 ROBERT L. CHRISTIE, WSBA #10895  
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NOTICE OF REMOVAL - 3

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SEATTLE, WA 98109  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I also hereby certify that I have mailed the document by US Postal Service to the following non-CM/ECF participants:

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